

REMARKS

No claims are amended. No new claims are added. Claims 1-45 are pending for consideration. In view of the following remarks, Applicant respectfully requests that this application be allowed and forwarded on to issuance.

The § 103 Rejections

Claims 1-9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over US Pub No. 2003/0158897 A1 to Ben-Natan et al., (hereinafter "Ben-Natan") in view of US Pub No. 2001/0056429 A1 to Moore et al. (hereinafter "Moore").

Claims 10-31, 33-35 and 37-45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ben-Natan in view of Moore and U.S Patent No. 6,668,369 to Krebs et al. (hereinafter "Krebs").

Claims 32 and 34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ben-Natan in view of Moore, Krebs and US Pub No. 2002/0026461A1 to Kutay et al. (hereinafter "Kutay").

Claims 1-9

Claim 1 recites a method of providing a user interface (UI) comprising:

- rendering a DHTML document from an XML document using at least one XSLT transformation (XSL-T); and
- presenting a user interface based, at least in part, on the XSL-T that was used to render the DHTML document.

In making out the rejection of claim 1, the Office argues that Ben-Natan teaches all of the subject matter of this claim (citing to page 1, paragraph [0022]) except for "using at least one XSLT transformation and presenting a user interface based, at least in part, on the XSL-T that was used to render the DHTML

1 document". The Office argues notes that Ben-Natan indicates that "the first form
2 may be an instance of the extensible markup language (XML) and the second form
3 in HTML or any extension of it such as DHTML or XHTML".

4 The Office then relies on Moore and argues that it teaches this subject
5 matter, citing to page 18, paragraph [0291] for support. Based on this, the Office
6 argues that the claimed subject matter would be obvious and, as motivation to
7 combine the references, the Office argues that such would "enable the user, at an
8 indefinite point in time in the future, to manipulate data/document infrastructure
9 independently and not limit to any state or quality of being independent of a
10 particular storage or computing platform or implementation or at most to only a
11 generic class of storage or computing platforms or implementations". See, Office
12 Action page 4, last paragraph.

13 Preliminarily, Applicant notes that Ben-Natan is a *continuation-in-part* of
14 U.S. Provisional Application No. 60/203,081. While the Ben-Natan's regular
15 patent application was filed on November 30, 2000 (after the June 21, 2000 filing
16 date of the present application), its corresponding provisional application was filed
17 on May 9, 2000, a little more than a month before the present application. By
18 virtue of Ben-Natan's regular application being a continuation-in-part, the Office
19 will surely appreciate that some subject matter of Ben-Natan (i.e. that which was
20 originally present in its provisional application) is to be accorded the effective date
21 of May 9, 2000; and, other subject matter (that which was added to make the
22 regular patent application a continuation-in-part) is to be accorded a different
23 effective date—that of the filing date of the regular patent application, in this case
24 November 30, 2000.

25 A careful comparison of the excerpt of Ben-Natan's regular application
cited by the Office (i.e. page 1, paragraph [0022]) and the originally filed

provisional application indicates that the material appearing in the excerpt of the Office does not appear in the provisional application. Specifically, Applicant can find no discussion in the provisional application that describes the subject matter cited by the Office including the notion that the "first form may be an instance of the extensible markup language (XML) and the second form in HTML or any extension of it such as DHTML or XHTML". In fact, nowhere in the provisional application can Applicant find the acronyms "DHTML" or "XHTML".

As such, it appears that this subject matter was added to the originally-filed provisional application. This being the case, this subject matter should be accorded an effective date of November 30, 2000. Because this effective date is *after* Applicant's filing date, this material does not constitute prior art.

As such, the Office has failed to establish a *prima facie* case of obviousness and this claim is allowable. To this extent, the Office's reliance on Moore is not seen to add anything of significance.

Claims 2-9 depend from claim 1 and, as such, are allowable as depending from an allowable base claim.

Claims 10-19

Claim 10 recites a method of providing a user interface comprising:

- considering multiple parameters one of which includes an XSL-T file; and
- based upon the considered parameters, rendering a user interface sufficient to enable a user to interact with a DHTML view that has been rendered by the XSL-T file from an XML document.

In making out the rejection of this claim, the Office argues that this claim "incorporate[s] substantially similar subject matter as cited in claim 1...and is similarly rejected along the same rationale".

Applicant submits that the Office has not established a *prima facie* case of obviousness for at least two different reasons. First, if the Office is using the same rationale as used in claim 1 as such pertains to Ben-Natan, then the subject matter on which the Office relies does not appear to have an effective date that renders it prior art. Second, and equally important, the subject matter of claim 10 is not "substantially similar subject matter" as recited in claim 1. For the Office's convenience, both of these claims are reproduced in the table below:

Claim 1	Claim 10
A method of providing a user interface (UI) comprising: rendering a DHTML document from an XML document using at least one XSLT transformation (XSL-T); and presenting a user interface based, at least in part, on the XSL-T that was used to render the DHTML document.	A method of providing a user interface comprising: considering multiple parameters one of which includes an XSL-T file; and based upon the considered parameters, rendering a user interface sufficient to enable a user to interact with a DHTML view that has been rendered by the XSL-T file from an XML document.

Applicant respectfully submits that, even a cursory review of the language of each claim indicates that the subject matter is not substantially similar.

Accordingly, for at least these two reasons, the Office has not established a *prima facie* case of obviousness. Given the Office's failure to establish a *prima facie* case of obviousness, the Office's reliance on Krebs is not seen to add anything of significance.

Claims 11-19 depend from claim 10 and, as such, are allowable as depending from an allowable base claim.

Claims 20-26

Claim 20 recites a method of providing a user interface comprising:

- making a selection in a DHTML view;
- determining, based upon the selection, a corresponding selection in an XML document;

- determining, based upon the corresponding selection in the XML document, a corresponding portion of an XML schema;
- determining, based upon the XML schema portion, one or more types of action that can be undertaken;
- producing one or more operations that can be undertaken for various determined action types; and
- determining, from an XSL-T file that rendered the DHTML view, a user interface type that can be displayed for a user and used to implement the one or more operations.

In making out the rejection of this claim, the Office argues that it incorporates "substantially similar subject matter as cited in claims 10-15 above, and is similarly rejected along the same rationale.

Applicant submits that the Office has not established a *prima facie* case of obviousness for at least two different reasons. First, if the Office is using the same rationale as used in claim 10 as such pertains to Ben-Natan, then the subject matter on which the Office relies does not appear to have an effective date that renders it prior art. Second, and equally important, the subject matter of claim 20 is not "substantially similar subject matter" as recited in claims 10-15. For the Office's convenience, both of these claims are reproduced in the table below:

Claim 10-15	Claim 20
<p>10. A method of providing a user interface comprising:</p> <ul style="list-style-type: none"> considering multiple parameters one of which includes an XSL-T file; and based upon the considered parameters, rendering a user interface sufficient to enable a user to interact with a DHTML view that has been rendered by the XSL-T file from an XML document. <p>11. The method of claim 10, wherein one parameter comprises a user location within a particular document.</p> <p>12. The method of claim 10, wherein one parameter comprises a portion of an XML schema that corresponds to a user's selection.</p> <p>13. The method of claim 10, wherein one parameter comprises one or more UI types that would be desirable to generate.</p> <p>14. The method of claim 10, wherein the parameters comprise:</p> <ul style="list-style-type: none"> a user location within a particular document; 	<p>20. A method of providing a user interface comprising:</p> <ul style="list-style-type: none"> making a selection in a DHTML view; determining, based upon the selection, a corresponding selection in an XML document; determining, based upon the corresponding selection in the XML document, a corresponding portion of an XML schema; determining, based upon the XML schema portion, one or more types of action that can be undertaken; producing one or more operations that can be undertaken for various determined action types; and determining, from an XSL-T file that rendered the DHTML view, a user interface type that can be displayed for a user and used to implement the one or more operations.

a portion of an XML schema that corresponds to a user's selection; and one or more UI types that would be desirable to generate.

15. The method of claim 10, wherein the considering of the multiple parameters comprises considering one or more constructs within an XSL-T file.

Applicant respectfully submits that even a cursory review of the language of each claim indicates that the subject matter is not substantially similar.

Accordingly, for at least these two reasons, the Office has not established a *prima facie* case of obviousness. Given the Office's failure to establish a *prima facie* case of obviousness, the Office's reliance on Krebs is not seen to add anything of significance.

Claims 21-26 depend from claim 20 and, as such, are allowable as depending from an allowable base claim.

Claims 27-34

Claim 27 recites a method of manipulating an XML document comprising:

- defining one or more crystals, each of which containing one or more behaviors and an XSLT transformation for transforming an XML document into a DHTML view;
- using the one or more crystals to render a DHTML view from an XML document;
- enabling user interaction with the DHTML view; and
- mapping, via the one or more behaviors, user interactions in the DHTML view to the XML document.

In making out the rejection of this claim, the Office argues that it incorporates "substantially similar subject matter as cited in claims 10 and 39 above, and is similarly rejected along the same rationale.

Applicant submits that the Office has not established a *prima facie* case of obviousness for at least two different reasons. First, if the Office is using the same rationale as used in claim 10 as such pertains to Ben-Natan, then the subject matter

on which the Office relies does not appear to have an effective date that renders it prior art. Second, and equally important, the subject matter of claim 27 is not "substantially similar subject matter" as recited in claims 10 and 39. For the Office's convenience, these claims are reproduced in the table below:

Claim 27	Claims 10 and 39
27. A method of manipulating an XML document comprising: defining one or more crystals, each of which containing one or more behaviors and an XSLT transformation for transforming an XML document into a DHTML view; using the one or more crystals to render a DHTML view from an XML document; enabling user interaction with the DHTML view; and mapping, via the one or more behaviors, user interactions in the DHTML view to the XML document.	10. A method of providing a user interface comprising: considering multiple parameters one of which includes an XSL-T file; and based upon the considered parameters, rendering a user interface sufficient to enable a user to interact with a DHTML view that has been rendered by the XSL-T file from an XML document. 39. A method of manipulating an XML document comprising: associating one or more behaviors with a DHTML tag in a DHTML view that has been rendered from an XML document; and responsive to a user interacting with a DHTML view associated with the DHTML tag, using the one or more behaviors to map user interactions to the XML document and effect structural changes on the XML document.

Applicant respectfully submits that even a cursory review of the language of each claim indicates that the subject matter is not substantially similar.

Accordingly, for at least these two reasons, the Office has not established a *prima facie* case of obviousness. Given the Office's failure to establish a *prima facie* case of obviousness, the Office's reliance on Krebs is not seen to add anything of significance.

Claims 28-34 depend from claim 27 and, as such, are allowable as depending from an allowable base claim. In addition, given the Office's failure to establish a *prima facie* case of obviousness, the rejection of claim 32 over Kutay is not seen to add anything of significance.

Claims 35-38

1 **Claim 35** recites one or more computer-readable media having computer-
2 readable instructions thereon which, when executed by a computer, cause the
3 computer to:

- 4 • provide multiple crystals, each of which containing one or more
5 behaviors and an XSLT transformation for transforming an XML
6 document into a DHTML view;
- 7 • use one or more of the crystals to render a DHTML view from an
8 XML document;
- 9 • attach at least one behavior to at least one DHTML tag;
- 10 • ascertain that a user has interacted with a DHTML view associated
11 with the at least one DHTML tag; and
- 12 • use the behavior associated with the at least one DHTML tag to map
13 a user interaction back to the XML document and make associated
14 structural changes in the XML document.

15 In making out the rejection of this claim, the Office argues that “claim 35 is
16 directed to a computer-readable media for performing the method of claims 10, 20,
17 27 and 39 and is similarly rejected under the same rationale.” Applicant
18 respectfully points out that claim 35 is an independent claim that merits an
19 independent examination. Nevertheless, for the reasons mentioned above, the
20 Office has failed to establish a *prima facie* case of obviousness and, for at least
21 those reasons, this claim is allowable.

22 **Claims 36-38** depend from claim 35 and, as such, are allowable as
23 depending from an allowable base claim. In addition, given the Office’s failure to
24 establish a *prima facie* case of obviousness, the rejection of claim 36 over Kutay is
25 not seen to add anything of significance.

Claims 39-45

Claim 39 recites a method of manipulating an XML document comprising:

- associating one or more behaviors with a DHTML tag in a DHTML view that has been rendered from an XML document; and
- responsive to a user interacting with a DHTML view associated with the DHTML tag, using the one or more behaviors to map user interactions to the XML document and effect structural changes on the XML document.

In making out the rejection of this claim, the Office argues that Ben-Natan teaches using one or more behaviors to map user interactions to the XML document and effect structural changes on the XML document”, citing to page 1, paragraph [0022]. As noted above, the subject matter cited to by the Office appears to be missing from Ben-Natan’s provisional application. Hence, its effective date is after the present application was filed. Accordingly, the material cited to by the Office does not appear to constitute prior art. As such, the Office has not established a *prima facie* case of obviousness and this claim is allowable. To this extent, the Office’s reliance on Moore and Krebs is not seen to add anything of significance.

Claims 40-44 depend from claim 39 and, as such, are allowable as depending from an allowable base claim.

Claim 45 recites a software structure embodied on a computer-readable medium comprising one or more crystals, each of which containing at least one behavior and XSL-T for rendering XML into DHTML, the behaviors being data shape dependent and being configured for use with common data shapes independent of any XML schema.

In making out the rejection of this claim, the Office argues that “claim 45 is directed to a computer-readable media for performing the method of claims 1, 40 and 42 and is similarly rejected under the same rationale.” Applicant respectfully points out that claim 45 is an independent claim that merits an independent examination. Nevertheless, for the reasons mentioned above, the Office has failed

1 to establish a *prima facie* case of obviousness and, for at least those reasons, this
2 claim is allowable.

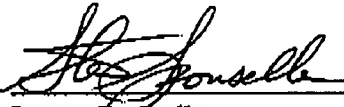
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4 **Conclusion**

5 All of the claims are in condition for allowance. Accordingly, Applicant
6 requests a Notice of Allowability be issued forthwith. If the Office's next
7 anticipated action is to be anything other than issuance of a Notice of Allowability,
8 Applicant respectfully requests a telephone call for the purpose of scheduling an
9 interview.

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11 Respectfully submitted,

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13 Dated: 11-19-04

14 By:

15  39,384
16 Lance R. Sadler
17 Reg. No. 38,605
18 (509) 324-9256
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